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Subject: Environmental Defense comments on N-Butyl Propionate (CAS# 590-01-2)

(Submitted via Internet 6/5/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and doug_anderson@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for N-Butyl Propionate (CAS# 590-01-2).

The test plan and robust summaries for n-butyl propionate (NBP) were submitted by the American Chemistry Council and the Dow Chemical Company. NBP is used for high-solid coatings in automobile finishes, appliance coatings, enamels, lacquers and printing inks. It is also used in polymerization resins for acrylic resins. The test plan states that NBP is not used in consumer applications, but no information is provided on potential releases or emissions arising as a consequence of the above-mentioned applications, at least some of which seem to indicate the possibility of consumer exposures. If additional data are available on the potential for human exposures, we recommend that they be included in the test plan.

The sponsor has, in general, produced a document that is informative, well-organized and contains sufficient detail to evaluate the adequacy of the test plan. The sponsor asserts in the test plan that existing data are sufficient to meet screening level requirements of the HPV Program, with the exception of environmental fate and distribution endpoints. We agree with this conclusion and support the proposal to conduct studies on photodegradation, stability in water and transport and distribution.

Other points are as follows:

1. Is NBP released into the environment from any of its uses?
2. n-Butanol is an impurity in NBP and the robust summaries indicate that this impurity occurs at <1%. Are there situations where n-butanol is found present in greater amounts? This is of potential concern, since n-butanol is known to cause hearing loss in workers.
3. Available studies indicate that NBP is biodegraded to some extent. Are there any data on its presence or absence in environmental media?
4. Mammalian toxicity studies demonstrate that NBP has a low order of toxicity in acute tests as well as repeat dose studies. These studies appear to be well-conducted, and we commend the sponsor on providing detailed and informative robust summaries.
5. Available data indicate that NBP is not a neurotoxin. Although neurotoxicity studies are not required by the HPV Program, they do provide important screening-level information.

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6. No reproductive toxicity studies are available on NBP, but the sponsor concludes that such studies are not needed because histological analyses of reproductive tract tissues in repeat dose studies, coupled with negative developmental toxicity studies, are sufficient to address the reproductive toxicity endpoint. We agree with the conclusion of the sponsor.

Thank you for this opportunity to comment.

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